

IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF PENNSYLVANIA

KEYSTONE REDEVELOPMENT
PARTNERS, LLC,

Plaintiff,

v.

THOMAS DECKER, *et al.*,

Defendants.

:
: Civil Action No. 08-2265
:
:
: (Hon. John E. Jones, III)
:
: Electronic Filing
:
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:

MOTION TO INTERVENE OF HSP GAMING, L.P.

HSP Gaming, L.P. (“HSP Gaming”), by its counsel below, hereby moves under Rule 24 of the Federal Rules of Civil Procedure to intervene in this action as a party defendant. The grounds and legal authorities in support of HSP Gaming’s Motion are set forth in the accompanying Memorandum of Law.

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Dated: January 9, 2009

Counsel for Movant HSP Gaming, L.P.

Certification Pursuant to LR 7.1

Pursuant to Local Rule 7.1, counsel for HSP Gaming, L.P. certifies that they requested the concurrence of Plaintiff's counsel to the relief requested in its Motion to Intervene, but after multiple telephone calls and email exchanges over several days, Plaintiff's counsel has neither granted nor denied concurrence to HSP Gaming's Motion. Counsel for HSP Gaming has also contacted counsel for defendants and requested defendants' concurrence to HSP Gaming's Motion to Intervene. Defendant's counsel informed counsel for HSP Gaming that, on behalf of all named defendants, they do not oppose HSP Gaming's Motion to Intervene. Defendants' counsel requested that HSP Gaming further advise the Court that the defendant Gaming Board members will be filing a dispositive motion as to all counts, seeking the dismissal of and/or abstention from all of the claims asserted by plaintiff against the named defendants.

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Counsel for Movant HSP Gaming, L.P.

Certificate of Service

I, Thomas E. Groshens, Esquire, hereby certify that on this 9th day of January, 2009, I caused a true and correct copy of the attached Motion of HSP Gaming to Intervene in this action, Certification of Counsel under LR 7.1, proposed form of Order, accompanying Memorandum of Law, and associated Exhibits, to be filed through the Court's ECF system, where the documents are available for viewing and downloading. I further certify that I caused true and correct copies of the foregoing documents to be sent by overnight mail to the following counsel:

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